

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

DENNIS WILSON, Individually and on
Behalf of All Others Similarly Situated,

Plaintiff,

v.

LSB INDUSTRIES, INC., JACK E.
GOLSEN, BARRY H. GOLSEN, MARK T.
BEHRMAN, TONY M. SHELBY, and
HAROLD L. RIEKER, JR.

Case No. 1:15-cv-07614-RA-GWG

**NOTICE OF MOTION AND MOTION FOR FINAL APPROVAL OF THE PROPOSED
SETTLEMENT AND THE PLAN OF ALLOCATION**

TO THE CLERK OF THE COURT AND ALL PARTIES AND THEIR ATTORNEYS OF RECORD HEREIN:

PLEASE TAKE NOTICE that, pursuant to the Court’s Order Preliminarily Approving Settlement and Providing for Notice (“Preliminary Approval Order,” ECF No. 180), on June 28, 2019 at 10:00 a.m., before the Honorable Ronnie Abrams, in Courtroom 1506 of the United States Courthouse, Southern District of New York, 40 Foley Square, New York, NY 10007, Lead Plaintiff Dennis Wilson and named Plaintiff Camelot Event Driven Fund (collectively “Plaintiffs”)¹ will and hereby do move the Court to: (1) grant final approval of the Settlement in the above-captioned action on the terms set forth in the Stipulation and Agreement of Settlement; and (2) approve the proposed Plan of Allocation for distribution of the Net Settlement Fund.

This motion is based on this Notice of Motion; the memorandum of law in support thereof; the Declaration of Casey E. Sadler in Support of (I) Plaintiffs’ Motion for Final Approval of Class Action Settlement and Plan of Allocation, and (II) Lead Counsel’s Motion for an Award of Attorneys’ Fees and Reimbursement of Litigation Expenses; the exhibits thereto; all pleadings and papers filed herein; arguments of counsel; and any other matters properly before the Court.

Plaintiffs are unaware of any opposition to this motion. Pursuant to the Preliminary Approval Order, any objection to Plaintiffs’ motion for final approval of the Settlement, certification of the Settlement Class or approval of the proposed Plan of Allocation for distribution of the Settlement Fund must be filed on or before June 7, 2019. To date, no objections have been filed.

¹ All capitalized terms that are not otherwise defined herein have the same meanings as set forth in the Stipulation of Settlement dated January 17, 2019 (“Stipulation,” ECF No. 179-1).

A proposed order granting the requested relief will be submitted with the reply papers after the deadline for objecting to Plaintiffs' motion has passed.

Respectfully submitted,

Dated: May 24, 2019

GLANCY PRONGAY & MURRAY LLP

/s/ Casey E. Sadler

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*Counsel for Plaintiffs and Lead Counsel for
the Settlement Class*

PROOF OF SERVICE

I, the undersigned say:

I am not a party to the above case and am over eighteen years old.

On May 24, 2019, I served true and correct copies of the foregoing document, by posting the document electronically to the ECF website of the United States District Court for the Southern District of New York, for receipt electronically by the parties listed on the Court's Service List.

I affirm under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on May 24, 2019.

s/ Casey E. Sadler
Casey E. Sadler